

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,	)	
	)	
Plaintiff	)	
	)	
V.	)	Civil Action No. 04-11935-DPW
	)	
ANDREA CABRAL, SUFFOLK	)	
COUNTY SHERIFF'S DEPARTMENT,	)	
SUFFOLK COUNTY, and	)	
CORRECTIONAL MEDICAL	)	
SERVICES, INC.	)	
	)	
Defendants	)	

**PLAINTIFF SHEILA PORTER'S RESPONSE TO GLOBE  
NEWSPAPER COMPANY, INC.'S MOTION TO MODIFY PROTECTIVE ORDER**

Plaintiff Sheila Porter ("Mrs. Porter") takes no position on, and has no opposition to, the Globe Newspaper Company, Inc.'s Motion to Modify Protective Order. Mrs. Porter entered into the Order proposed by the Defendants as a routine matter at the beginning of the litigation and does not intend to disclose any material covered by the Order. However, defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County ("Suffolk Defendants") have invoked the Protective Order to cover numerous documents and depositions in this matter and then selectively disclosed information publicly. For instance, the Suffolk Defendants designated a Sheriff's Investigative Division Incident Report as confidential and then later attached it to one of their Motions to Compel without moving to impound the motion and attachments. *See* Motion to Compel the Production of Testimony and Documents From the FBI, dated July 15, 2005, Exhibit

H (Bates No. 791). Thus, while it is not clear that the Protective Order is actually being applied by the Defendants to only protect material which is truly deserving of protection, Mrs. Porter is not seeking to disclose designated confidential information and thus does not have a position that the Court needs to assess in connection with the motion filed by the Globe.

Respectfully Submitted

SHEILA J. PORTER

By her attorneys,

/s/ Joseph F. Savage Jr.

Joseph F. Savage Jr. (BBO #443030)  
David S. Schumacher (BBO #647917)  
GOODWIN PROCTER LLP  
Exchange Place  
Boston, MA 02109-2881  
617.570.1000

Dated: September 15, 2005